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Case 8:24-cv-00067-FWS-JDE Document 51

Pursuant to Local Rules 7-1 and 7-3, and Section VIII of the Court's Civil Standing Order, Plaintiff Kimberly Hudson-Bryant ("Plaintiff") and Defendants OCMBC, Inc. d/b/a LoanStream ("LoanStream") and Sean Roberts ("Roberts") (collectively, "Defendants") (together with Plaintiff, the "Parties") hereby stipulate and agree as follows:

WHEREAS, the Court issued a scheduling order under Federal Rule of Civil Procedure 26(f) on October 24, 2024, ("Scheduling Order") which imposed, among other things, a non-expert discovery cut-off of May 12, 2025. (ECF No. 48).

WHEREAS, the Court issued its Order re Joint Motion and Stipulation to Continue Case Deadlines ("Revised Scheduling Order") on April 28, 2025, which among other things, continued the non-expert discovery cut-off to July 11, 2025, and reset related litigation dates (ECF No. 50);

WHEREAS, the Parties have continued to engage in substantial written and oral discovery since the Court issued the Revised Scheduling Order, but additional, unforeseen scheduling and health-related issues involving both (a) Plaintiff and (b) a key percipient witness and LoanStream's 30(b)(6) witness prevent the completion of discovery pursuant to the Revised Scheduling Order, which in turn prevents compliance with the class certification and expert discovery deadlines.

WHEREAS, the Parties now jointly agree, stipulate, and request that the Court vacate and continue all deadlines in the Revised Scheduling Order by approximately 90 days, as proposed below or as otherwise convenient for the Court.

WHEREAS, the Parties have exercised due diligence to date and believe good cause exists to modify the Revised Scheduling Order for the reasons outlined herein and in the accompanying declarations of Thomas F. Landers, and Andrew R. Perrong filed concurrently herewith.

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NOW, THEREFORE, THE PARTIES HEREBY STIPULATE, AGREE and request that the Court extend all future deadlines in this case as follows:

Event	Current Deadline	Proposed Deadline
Start of Jury Trial	02/10/26	05/12/26
Final Pretrial Conference/Hearing on Motions in Limine	01/15/26	04/16/26
L/D to File Motion for Class Certification	07/18/25	10/16/25
L/D to File Opposition to Class Certification	08/14/25	11/12/25
L/D to File Reply to Class Certification	08/28/25	11/26/25
Hearing on Motion for Class Certification	09/25/25	12/18/25
Non-Expert Discovery Cut-Off	07/11/25	10/09/25
Expert Disclosure (Initial)	07/28/25	10/27/25
Expert Disclosure (Rebuttal)	08/11/25	11/10/25
Expert Discovery Cut-Off	08/15/25	11/13/25
Last Date to Hear Motions	10/16/25	01/14/26
L/D to Complete Settlement Conference	10/31/25	01/29/26
Trial Filings (First Round)	12/5/25	03/05/26
Trial Filings (Second Round)	12/12/25	03/12/26

IT IS SO STIPULATED.

[Signatures on Following Page]

Case	8:24-cv-00067-FWS-JDE	Document 51 #:316	Filed 06/20/25	Page 4 of 5	Page ID	
1 2	DATED: June 20, 2025	SOLOMON WARD SEIDENWURM & SMITH, LLP				
3 4		By: /s/ Thomas F. Landers				
5		THOMAS F. LANDERS Attorneys for Defendant,				
6		OCMBC, INC., dba LOANSTREAM MORTGAGE				
7 8	DATED: June 20, 2025	PARONICH LAW, PC				
9	DATED. June 20, 2023	J FARONICII LAW, FC				
10	By: /s/ Anthony L. Paronich					
11 12		ANTHONY L. PARONICH Attorneys for Plaintiff, KIMBERLY HUDSON-BRYANT				
13		K	IMBERLT HOL	SON-DKIA	IN 1	
14	DATED: June 20, 2025	PERF	RONG LAW LLO	C		
15 16		By: /	/s/ Andrew R. Per	rrong		
17		ANDREW R. PERRONG Attorneys for Plaintiff,				
18 19		KIMBERLY HUDSON-BRYANT				
20	DATED: June 20, 2025	DEFI	ENDANT PRO S	E		
21		_				
22 23	By: <u>/s/ Sean Roberts</u> SEAN ROBERTS					
24		In	dividual Defenda	ant		
25						
26 27						
28						
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ATTESTATION OF SIGNATURE

Pursuant to Central District Local Rule 5-4.3.4(a)(2)(i), I hereby certify that the content of this document is acceptable to Mr. Anthony L. Paronich and Mr. Andrew R. Perrong, counsel for Plaintiff, and Mr. Sean Roberts, defendant *pro se* in this action. I further certify that I obtained authorization from Mr. Paronich, Mr. Perrong, and Mr. Roberts prior to affixing their electronic signatures to this document.

/s/ Thomas F. Landers
THOMAS F. LANDERS
Attorneys for Defendant,
OCMBC, INC. dba
LOANSTREAM MORTGAGE

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